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**UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN JOSE DIVISION**

)	
)	Case No. 5:24-cv-07879-VKD
CHIRANJIT MUKHERJEE, et al,)	
)	STIPULATION TO STAY
Plaintiffs,)	PROCEEDINGS AND PROPOSED
)	ORDER]
v.)	
)	Re: Dkt. No. 10
UNITED STATES CITIZENSHIP &)	
IMMIGRATION SERVICES, et al,)	
)	
Defendants.)	
)	
)	

Pursuant to Rules 6-2, 7-1(a)(5), and 7-12 of the Civil Local Rules of the United States District Court of the Northern District of California, the parties, through their undersigned counsel, hereby stipulate and respectfully request the Court to stay proceedings in this case for a limited time, up to and including May 16, 2025. The parties make this joint request because they are pursuing an administrative resolution that may render further litigation of this case unnecessary.

1. Plaintiffs filed this action seeking adjudication of their Form I-526E, Immigrant Petitions by

1 Regional Center Investor (“Form I-526E Petition”).

2 2. Defendants’ response to the complaint is currently due on January 17, 2025.

3 3. The parties request the stay to allow Defendant United States Citizenship and Immigration
4 Services (“USCIS”) sufficient time to request additional evidence from Plaintiffs, if necessary,
5 and to review and adjudicate the petitions. USCIS will work diligently towards completing
6 adjudication of the Form I-526E Petitions, absent the need for further adjudicative action or
7 unforeseen circumstances that would require additional time for adjudication.

8 4. The parties additionally request that the Court waive and/or stay any filing deadlines until the
9 stay is lifted.

10 5. Upon receipt of USCIS’ decision, Plaintiffs agree to voluntarily dismiss the case.

11 6. During the stay, the parties will file a joint status report with the Court every 45 days.

12 Accordingly, the parties stipulate and request that the proceedings in this case be stayed until May
13 16, 2025. At that time, the parties may request a further continuance of the stay of proceedings, dismissal
14 of the litigation if appropriate, or placement of the case back on the Court’s active docket. A stay of
15 proceedings in this case will benefit the parties and conserve the Court’s resources while the parties pursue
16 this administrative resolution.

17 Dated: December 23, 2024

Respectfully submitted,¹

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19 BRIAN M. BOYNTON
Principal Deputy Assistant Attorney General
20 Civil Division

21 MATTHEW P. SEAMON
22 Senior Litigation Counsel

23 /s/ Luz Maria Restrepo
24 LUZ MARIA RESTREPO
25 Trial Attorney

Counsel for Defendant

27 ¹ In accordance with Civil Local Rule 5-1(i)(3), the filer of this document attests that all
28 signatories listed herein concur in the filing of this document.

1 Dated: December 23, 2024

/s/ Niralkumar Patel
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Counsel for Plaintiffs

6 ~~**PROPOSED**~~ ORDER

8 Pursuant to stipulation, IT IS SO ORDERED.

9 Date: December 24, 2024

10 
VIRGINIA K. DEMARCHI
United States Magistrate Judge